

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOY CORCIONE, *et al.*,

Plaintiffs,

V.

**METHODIST HOSPITAL D/B/A
HOUSTON METHODIST, HOUSTON
METHODIST HOSPITAL, HOUSTON
METHODIST–TEXAS MEDICAL
CENTER, METHODIST HOSPITAL–
HOUSTON, METHODIST HOSPITAL–
TEXAS MEDICAL CENTER, AND
METHODIST HOSPITAL SYSTEM,**

Defendant.

CIVIL ACTION NO. 3:14-cv-160

JURY TRIAL DEMANDED

JOINT MOTION TO FILE JOINT MOTION FOR SETTLEMENT
APPROVAL UNDER SEAL

Plaintiffs Joy Corcione, et al. and Defendant Methodist Hospital file this Joint Motion to File the Parties' Joint Motion for Settlement Approval Under Seal, and respectfully state as follows:

Plaintiff Joy Corcione filed this action on May 9, 2014, seeking unpaid wages under the Fair Labor Standards Act of 1938, as amended (“FLSA”), 29 U.S.C. § 201 *et seq.* The case was conditionally certified as a collective action, with Plaintiffs seeking unpaid overtime wages, liquidated damages, and attorneys’ fees and costs.

The Parties have reached a resolution of this matter and have entered into a confidential Settlement Agreement. Because Plaintiffs' claims arise under the

FLSA, the Settlement Agreement requires Court approval in order for the settlement to become effective.

The parties' Joint Motion for Settlement Approval is being filed simultaneously with this Motion. Because the Joint Motion for Settlement Approval and its exhibits, including a copy of the Parties' Settlement Agreement, contain confidential information, and specifically information implicating the confidentiality provisions of the settlement, the Parties request that the Motion and its exhibits, including the Settlement Agreement, be filed under seal.

The filing of the Joint Motion for Settlement Approval with accompanying Settlement Agreement is necessary in order to allow the final resolution of this matter.

WHEREFORE, the Parties respectfully request that the Court grant this Joint Motion to File the Parties' Joint Motion for Settlement Approval Under Seal.

Dated: June 16, 2016

Respectfully submitted,

/s/ Galvin B. Kennedy *by permission

Galvin B. Kennedy
Texas State Bar No. 00796870
Federal Bar No. 20791
KENNEDY HODGES, L.L.P.
711 West Alabama St.
Houston, Texas 77006
Telephone: (713) 523-0001
Facsimile: (713) 523-1116
gkennedy@KennedyHodges.com

ATTORNEYS FOR PLAINTIFFS

/s/ G. Mark Jodon

G. Mark Jodon
Texas State Bar No. 10669400
Federal Bar No. 6052
LITTLER MENDELSON, P.C.
1301 McKinney, Suite 1900
Houston, TX 77010
Telephone: (713) 951-9400
Facsimile: (713) 951-9212
mjodon@littler.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties pursuant to the Southern District of Texas ECF on June 16, 2016.

/s/ Kevin Little

Kevin Little